Marcus O. Colabianchi (SBN 208698) 1 Geoffrey A. Heaton (SBN 206990) DUANE MORRIS LLP 2 Spear Tower 3 One Market Plaza, Suite 2200 San Francisco, CA 94105-1127 Telephone: (415) 957 3000 4 Fax: (415) 957 3001 E-mail: mcolabianchi@duanemorris.com 5 E-mail: gheaton@duanemorris.com 6 Attorneys for Creditor, The Acceleration Group, LLC 7 8 9 10 UNITED STATES BANKRUPTCY COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 OAKLAND DIVISION 13 In re: Case No. 25-40893 WJL 14 SAINT CLOUD INC. Chapter 11 15 NOTICE OF HEARING ON MOTION TO Debtor. **DISMISS CHAPTER 11 CASE** 16 Date: August 6, 2025 17 Time: 10:30 a.m. Place: 1300 Clay Street, Courtroom 220 18 Oakland, CA 94612 19 TO THE DEBTOR, SUB-CHAPTER V TRUSTEE, ALL CREDITORS AND INTERESTED 20 **PARTIES:** 21 PLEASE TAKE NOTICE that a hearing on creditor The Acceleration Group, LLC's 22 ("Movant" or "TAG") Motion to Dismiss Chapter 11 Case, ("Motion") will be held on August 6, 23 2025 at 10:30 a.m. before the Honorable William J. Lafferty of the captioned Court. 24 PLEASE TAKE FURTHER NOTICE that by the Motion, TAG moves for entry of an order 25 dismissing the captioned chapter 11 case for "cause" under 11 U.S.C. § 1112(b) with a 120-day bar 26 on re-filing a bankruptcy case. Further information can be found in the Motion, the Request for 27 Judicial Notice and Declaration of Geoffrey A. Heaton in support of the Motion, all of which have 28

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been filed and served herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rule 9014-1(c)(1), opposition to the granting of the Motion, if any, must be filed with the Court and served on the undersigned counsel no later than 14 days prior to the captioned hearing date.

PLEASE TAKE FURTHER NOTICE that (1) the hearing will be held in person but parties may attend by Zoom Webinar/AT&T Teleconference, (2) additional information is available on Judge Lafferty's Procedures page on the Court's website (https://www.canb.uscourts.gov), and (3) information on how to attend the hearing by Zoom Webinar/AT&T Teleconference will be included with each calendar posted under Judge Lafferty's Calendar on the court's website.

Dated: July 8, 2025

DUANE MORRIS LLP

By: /s/ Geoffrey A. Heaton (206990) GEOFFREY A. HEATON

Attorneys for The Acceleration Group, LLC